

March 14, 2005

Filed Electronically

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: **In the Matter of Implementation of Section 304 of the  
Telecommunications Act of 1996 (Commercial Availability  
of Navigation Devices), CS Docket No. 97-80**

Dear Ms. Dortch:

On Monday, March 14, 2005, John Godfrey, Pioneer North America, Inc., Vice President for Government and Industry Affairs (the undersigned), Joel Wiginton, Sony Electronics Inc. ("Sony") Vice President and Senior Counsel for Government Affairs, Jim Morgan, Sony Director for Government and Industry Affairs, and Jeffrey Turner of Patton Boggs representing Sony met with Catherine Bohigian, Legal Advisor to Commissioner Kevin Martin. We discussed the following:

- The importance of "common reliance" for the development of an equitable, and thus, competitive market for navigation devices.
- The advantages to consumers of a competitive navigation device market (*e.g.*, reduced costs, consumer choice of features and functions, innovative consumer-friendly designs from numerous competitive manufacturers).
- The fact that future software conditional access technology ("downloadable security") is being developed under a nondisclosure agreement which therefore does not afford the Commission or the public the requisite information to evaluate the efficacy of the technology nor the schedule by which the technology will be available and deployed.
- The need for the Commission to require that "multi-stream" CableCARDs and testing procedures and tools to implement multi-stream CableCARD interfaces be made available for unidirectional cable-ready products by a date certain in the near future so as to enable consumer-friendly features such as recording one digital channel while watching another—a feature that is currently available to consumers only through equipment leased from cable operators, because cable operators' equipment is not required to rely on CableCARDs and therefore does not suffer from the absence of multi-stream CableCARDs.
- The need for the Commission to provide oversight to ensure that the licensing terms for downloadable security will be reasonable, nondiscriminatory, and will not address in any way the features and functions of the host device other than the minimum necessary to protect

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- cable networks from technical harm to the cable network, theft of service and protection of content.
- The need for the Commission to require that downloadable security technologies receive approval from an ANSI-accredited standards body.
  - The need for the Commission to have active oversight of the ongoing “bi-directional plug-and-play” negotiations.

Respectfully submitted,

(signed)

John Godfrey  
Vice President, Government &  
Industry Affairs  
Pioneer North America, Inc.

cc: Ms. Catherine Bohigian